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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN CASTILLO,

Defendant.

Criminal No: 23-CR-29-S

MOTION FOR CONTINUANCE OF JONATHAN CASTILLO’S SENTENCING


COMES NOW, the Defense Counsel, Cindi Wood, CWLS and moves this Court for a continuance in the above-captioned matter now set for sentencing on Friday, September 15, 2023 @ 9:00 a.m., for the following reasons:

1. Defense counsel has a significant scheduling conflict as she has a medical procedure that is against medical advice to be rescheduled.
2. Defense counsel is a sole practitioner and does not have another attorney in the office who could represent the Defendant.
3. Regardless of the sentence, Defendant is aware that he would not be released from custody as he remains on his sentence from the State of Wyoming.

4. Defense counsel is still awaiting information from Defendant's State Criminal Representatives to present at the sentencing regarding the underlying sentence, but at a minimum to provide necessary information to Defendant prior to the sentencing.
5. There is a possibility that one of the related cases uncovered exculpatory information and such should be discussed with the government and determine the reliability thereof.
6. There is no prejudice to the Defendant or the US Government in granting a brief continuance of this scheduled sentencing. This case and the related cases remain open and presently the Defendant will remain incarcerated regardless of the outcome of his sentencing.
7. It is in the best interest of justice to permit the continuance.
8. Timothy J. Forwood does not oppose a continuance of the sentencing based on counsel's medical need.
9. Given the scenario as presented, Defense Counsel believes good cause is shown for a continuance on the sentencing.


WHEREFORE the Defendant respectfully moves the Court to continue the aforementioned sentencing for a delay of no less than one week to conclude her medical procedure, to discuss the validity of any exculpatory evidence claims with the Government, and to get any final preparation completed with the Defendant for his sentencing.

RESPECTFULLY SUBMITTED this 13th day of September, 2023.


Cindi Wood, #6-3282
Attorney for the Defendant
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CERTIFICATE OF SERVICE (CM/ECF)

Cindi Wood, Attorney for Defendant, hereby certifies that a true and correct copy of the foregoing was served via CM/ECF electronic service upon counsel of record on this 13th day of September, 2023.


Cindi Wood, Attorney for Defendant